

CP:CC
F.#2005R00931


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

S U P E R S E D I N G
I N D I C T M E N T

Cr. No. 04-515 (S-4) (DGT)
(T. 21, U.S.C., §§ 841(a)(1),
841(b)(1)(A)(ii)(II), 846,
952(a), 960(a)(1),
960(b)(1)(B)(ii) and 963;
T. 18, U.S.C., §§ 922(g)(1),
924(a)(2), 924(c)(1)(A)(i),
1956(a)(1)(A)(i),
1956(a)(1)(B)(i), 1956(h),
2 and 3551 et seq.)

JOSE ESCOBAR OREJUELA,
also known as "Tabla," "Robles"
and "Doctor Robles,"
GRECIA ESCOBAR,
also known as "La Tia,"
JESUS TOVAR,
also known as "Chucho,"
JORGE IGNACIO FIGUEROA,
also known as "Nacho,"
GUSTAVO FIGUEROA BEDOYA,
also known as "Doctor Meneses,"
"Meneses" and "Gordo,"
WENCESLAO FIGUEROA,
PEDRO FIGUEROA BEDOYA,
also known as "El Indio,"
* WILLIAM FIGUEROA,
also known as "Memo,"
GEITHNERT THORP,
also known as "Alex" and
"Nestor Vasquez,"
JOSEPH ESCOBAR, JR.,
* CENIDE TOVAR,
also known as "Cenia,"
* MANUEL LLANOS ESCOBAR,
* LUZDARI COMORI,
* JULIO GONGORA,
JOSE M. ESCOBAR, JR.,
also known as "Joey,"
CARMEN RODRIGUEZ DE SALINAS,
* LUIS IBARGUEN,

JOSE GUERRERO,
also known as "Jarry," and
ALBERTO BRENS,

Defendants.

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THE GRAND JURY CHARGES:

COUNT ONE
(Conspiracy to Import Cocaine)

1. In or about and between January 2000 and March 2005, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOSE ESCOBAR OREJUELA, also known as "Tabla," "Robles" and "Doctor Robles," GRECIA ESCOBAR, also known as "La Tia," JESUS TOVAR, also known as "Chucho," JORGE FIGUEROA, also known as "Nacho," GUSTAVO FIGUEROA BEDOYA, also known as "Doctor Meneses," "Meneses" and "Gordo," WENCESLAO FIGUEROA, PEDRO FIGUEROA BEDOYA, also known as "El Indio," WILLIAM FIGUEROA, also known as "Memo," GEITHNERT THORP, also known as "Alex" and "Nestor Vasquez," JOSEPH ESCOBAR, JR., CENIDE TOVAR, also known as "Cenia," MANUEL LLANOS ESCOBAR, LUZDARI COMORI, JULIO GONGORA, JOSE M. ESCOBAR, JR., also known as "Joey," CARMEN RODRIGUEZ DE SALINAS, LUIS IBARGUEN, [REDACTED], [REDACTED] JOSE GUERRERO, also known as "Jarry," and ALBERTO BRENS, together with others, did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled

substance, in violation of Title 21, United States Code, Section 952(a).

(Title 21, United States Code, Sections 963, 960(a)(1) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO
(Conspiracy to Distribute Cocaine)

2. In or about and between January 2000 and March 2005, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOSE ESCOBAR OREJUELA, also known as "Tabla," "Robles" and "Doctor Robles," GRECIA ESCOBAR, also known as "La Tia," JESUS TOVAR, also known as "Chucho," JORGE FIGUEROA, also known as "Nacho," GUSTAVO FIGUEROA BEDOYA, also known as "Doctor Meneses," "Meneses" and "Gordo," WENCESLAO FIGUEROA, PEDRO FIGUEROA BEDOYA, also known as "El Indio," WILLIAM FIGUEROA, also known as "Memo," GEITHNERT THORP, also known as "Alex" and "Nestor Vasquez," JOSEPH ESCOBAR, JR., CENIDE TOVAR, also known as "Cenia," MANUEL LLANOS ESCOBAR, LUZDARI COMORI, JULIO GONGORA, JOSE M. ESCOBAR, JR., also known as "Joey," CARMEN RODRIGUEZ DE SALINAS, LUIS IBARGUEN, [REDACTED] [REDACTED] JOSE GUERRERO, also known as "Jarry," and ALBERTO BRENS, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled

substance, in violation of Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(ii)(II); Title 18, United States Code, Sections 3551 et seq.)

COUNT THREE
(Cocaine Importation)

3. On or about and between August 20, 2003 and August 28, 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOSE ESCOBAR OREJUELA, also known as "Tabla," "Robles" and "Doctor Robles," GRECIA ESCOBAR, also known as "La Tia," JESUS TOVAR, also known as "Chucho," JORGE FIGUEROA, also known as "Nacho," GUSTAVO FIGUEROA BEDOYA, also known as "Doctor Meneses," "Meneses" and "Gordo," WENCESLAO FIGUEROA, WILLIAM FIGUEROA, also known as "Memo," GEITHNERT THORP, also known as "Alex" and "Nestor Vasquez," JOSEPH ESCOBAR, JR., CENIDE TOVAR, also known as "Cenia," MANUEL LLANOS ESCOBAR and ALBERTO BRENŠ, together with others, did knowingly and intentionally import a controlled substance into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2 and 3551 et seq.)

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COUNT FOUR
(Cocaine Distribution)

4. On or about and between August 28, 2003 and October 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOSE ESCOBAR OREJUELA, also known as "Tabla," "Robles" and "Doctor Robles," GRECIA ESCOBAR, also known as "La Tia," JESUS TOVAR, also known as "Chucho," JORGE FIGUEROA, also known as "Nacho," GUSTAVO FIGUEROA BEDOYA, also known as "Doctor Meneses," "Meneses" and "Gordo," WENCESLAO FIGUEROA, WILLIAM FIGUEROA, also known as "Memo," GEITHNERT THORP, also known as "Alex" and "Nestor Vasquez," JOSEPH ESCOBAR, JR., CENIDE TOVAR, also known as "Cenia," MANUEL LLANOS ESCOBAR and ALBERTO BRENS, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FIVE
(Cocaine Importation)

5. On or about and between November 30, 2003 and December 5, 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOSE ESCOBAR OREJUELA, also known as "Tabla," "Robles"

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and "Doctor Robles," GRECIA ESCOBAR, also known as "La Tia," JESUS TOVAR, also known as "Chucho," JORGE FIGUEROA, also known as "Nacho," GUSTAVO FIGUEROA BEDOYA, also known as "Doctor Meneses," "Meneses" and "Gordo," WENCESLAO FIGUEROA, WILLIAM FIGUEROA, also known as "Memo," JOSEPH ESCOBAR, JR., CENIDE TOVAR, also known as "Cenia," LUZDARI COMORI and LUIS IBARGUEN, together with others, did knowingly and intentionally import a controlled substance into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SIX
(Cocaine Distribution)

6. On or about December 5, 2003, within the Eastern District of New York and elsewhere, the defendants JOSE ESCOBAR OREJUELA, also known as "Tabla," "Robles" and "Doctor Robles," GRECIA ESCOBAR, also known as "La Tia," JESUS TOVAR, also known as "Chucho," JORGE FIGUEROA, also known as "Nacho," GUSTAVO FIGUEROA BEDOYA, also known as "Doctor Meneses," "Meneses" and "Gordo," WENCESLAO FIGUEROA, WILLIAM FIGUEROA, also known as "Memo," JOSEPH ESCOBAR, JR., CENIDE TOVAR, also known as "Cenia," LUZDARI COMORI and LUIS IBARGUEN, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five kilograms or

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more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SEVEN
(Cocaine Importation)

7. On or about and between April 18, 2000 and April 22, 2000, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOSE GUERRERO, also known as "Jarry," together with others, did knowingly and intentionally import a controlled substance into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT EIGHT
(Cocaine Distribution)

8. On or about and between April 18, 2000 and May 2000, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOSE GUERRERO, also known as "Jarry," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five kilograms or more

of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT NINE
(Unlawful Possession of Firearm)

9. In or about and between September 2003 and May 21, 2004, both dates being approximate and inclusive, within the District of New Jersey, the Southern District of New York and elsewhere, the defendant ALBERTO BRENS did knowingly and intentionally possess a firearm in furtherance of one or more drug trafficking crimes, to wit: the crimes charged in Counts One through Four, and did knowingly and intentionally use and carry a firearm during and in relation to said drug trafficking crimes.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 2 and 3551 et seq.)

COUNT TEN
(Possession of Firearm by a Felon)

10. In or about and between September 2003 and May 21, 2004, both dates being approximate and inclusive, within the District of New Jersey, the Southern District of New York and elsewhere, the defendant ALBERTO BRENS, having previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly and intentionally possess in

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and affecting commerce a firearm, to wit: a Smith & Wesson .357 caliber Magnum revolver, and ammunition.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 3551 et seq.)

COUNT ELEVEN
(Money Laundering Conspiracy)

11. In or about and between January 2000 and August 28, 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOSE ESCOBAR OREJUELA, also known as "Tabla," "Robles" and "Doctor Robles," GRECIA ESCOBAR, also known as "La Tia," GEITHNERT THORP, also known as "Alex" and "Nestor Vasquez," JOSEPH ESCOBAR, JR., CENIDE TOVAR, also known as "Cenia," and MANUEL LLANOS ESCOBAR, together with others, did knowingly and intentionally conspire to conduct financial transactions in and affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, to wit: narcotics trafficking, in violation of Title 21, United States Code, Sections 846 and 963, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, (a) with the intent to promote the carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i), and (b) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the

proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

COUNT TWELVE
(Money Laundering)

12. In or about and between June 2000 and August 28, 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOSE ESCOBAR OREJUELA, also known as "Tabla," "Robles" and "Doctor Robles," GRECIA ESCOBAR, also known as "La Tia," GEITHNERT THORP, also known as "Alex" and "Nestor Vasquez," JOSEPH ESCOBAR, JR., CENIDE TOVAR, also known as "Cenia," and MANUEL LLANOS ESCOBAR, together with others, did knowingly and intentionally conduct financial transactions in and affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, to wit: narcotics trafficking, in violation of Title 21, United States Code, Sections 846 and 963, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, (a) with the intent to promote the carrying on of the specified unlawful activity, and (b) knowing that the transactions were designed in whole and in part to conceal


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and disguise the nature, the location, the source, the ownership
and the control of the proceeds of the specified unlawful activity.

(Title 18, United States Code, Sections 1956(a)(1)(A)(i),
1956(a)(1)(B)(i), 2 and 3551 et seq.)

A TRUE BILL



FOREPERSON


ROSLYNN R. MAUSKOPF
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. F. # 2005F000931

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK
Criminal Division

THE UNITED STATES OF AMERICA

vs.

JOSE ESCOBAR ORJUELA, a/k/a/
"Tobia," "Robles" and
"Doctor Robles," et al.,

Defendants.

SUPERSEDING INDICTMENT

04 CR 515 (S-4) (DGT)

a true bill



Foreman

Filed in open court this _____ day,
of _____ A.D.

By, s/

Chief

Carrie N. Capwell, AUSA (718) 254-6426

(T. 21 U.S.C. §§ 841(a)(1),
841(b)(1)(A)(i)(I), 846,
952(a), 960(a)(1), 960
(b)(1)(B)(i) and 963;
T. 18 U.S.C. §§ 922(e)(1),
924(a)(2), 924(c)(1)(A)(i),
1956(a)(1)(A)(i), 1956(a)(1)
(B)(i), 1956(h), 2 and 3551
et seq.)